

MAHSA PARVIZ

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MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

JAN 24 2025

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INITIAL

UNITED STATES COURT OF APPEALS
IN AND FOR THE NINTH CIRCUIT

UNITED STATES OF AMERICA

C.A. No. 24-2746 (related
C.A. No. 22-50160; 24-4709; 23-35601)

v.

MAHSA PARVIZ

REPLY IN SUPPORT OF
RENEWED MOTION FOR
BAIL PENDING APPEAL
(C.A. Dkt No. 21)

COMES NOW, defendant MAHSA PARVIZ, and files this REPLY in support of her renewed motion for bail pending appeal.

The Government contends that Parviz's renewed motion for bail pending appeal cannot be granted by this Court because it was not filed in related C.A. No. 22-50160, however, the Government is remiss and did ~~cannot~~, nor can it, provide any legal authority in support of their conjecture. It is simply the Government's opinion that this Court should not grant bail pending appeal but an opinion absent legal authority lacks merit when weighed against the facts supporting Defendant's release on bail pending appeal pursuant to FRAP 9(b)(2), and Fed. R. Crim. P. 37. Therein, Defendant expressly requested that the Clerk remit a copy of the motion to the district court and on information and belief, the Hon. Stanley Blumenfeld, Jr. denied the ~~ex parte~~ motion.

Moreover, Defendant's Motion for Reassignment under 18 USC § 3144, 455, is also pending appeal before this Court.

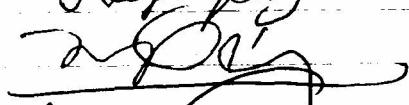
Defendant recently filed, in the district Court, a renewed Motion to terminate Supervised release (Dkt. No. 191) subject to mandatory reassignment and pending appeal for having served 34 months in BOP custody to no benefit as of January 15, 2025.

Defendant's term of supervised release as to Ct. 1 was 36 months prior to re-sentencing, and can only carry 12 to 36 months upon re-sentencing.

Defendant's release is simply long overdue and the Government cannot dispute the fact that Defendant has served excess time, nor can the Government restore said time to Defendant for this wrongful, excessive incarceration.

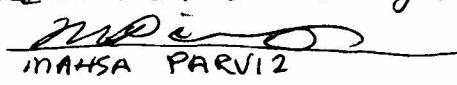
WHEREFORE, Defendant prays this Court grant her motion for bail pending appeal and order her instant release from BOP custody under any condition(s) it deems just and necessary if it chooses to order condition(s).

DATED: January 15, 2025

Respectfully submitted

Martha Parviz

CERTIFICATE OF SERVICE

I hereby swear under penalty of perjury that a true and correct copy of the foregoing was mailed to the Clerk for service on AUSA Jenna Long via ECF dated: January 15, 2025


MAHTSA PARVIZ